

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

GABRIEL NAVARRO, Individually and on
Behalf of All Others Similarly Situated,

Plaintiff,

v.

REALPAGE, INC.; GREYSTAR REAL
ESTATE PARTNERS, LLC; CUSHMAN &
WAKEFIELD, INC.; PINNACLE PROPERTY
MANAGEMENT SERVICES, LLC; BH
MANAGEMENT SERVICES, LLC; CAMPUS
ADVANTAGE, INC.; CARDINAL GROUP
HOLDINGS LLC; CA VENTURES GLOBAL
SERVICES, LLC; D.P. PREISS COMPANY,
INC.; THE MICHAELS ORGANIZATION,
LLC and INTERSTATE REALTY
MANAGEMENT COMPANY,

Defendants.

No. 2:22-cv-01552-RSL

STIPULATED MOTION AND
ORDER SUSPENDING
DEADLINE FOR CERTAIN
DEFENDANTS TO RESPOND TO
COMPLAINT

Pursuant to Local Civil Rules 7(d)(1), 7(j), and 10(g), Plaintiff Gabriel Navarro (“Plaintiff”) and Defendants CA Ventures Global Services, LLC, D.P. Preiss Company, Inc., The Michaels Organization, LLC, and Interstate Realty Management Company, (collectively, the “Stipulating Defendants”), by and through their respective counsel,¹ hereby stipulate as follows:

WHEREAS, Plaintiff filed a Class Action Complaint (the “Complaint”) on November 2, 2022. ECF No. 1.

WHEREAS, Plaintiff has served the Stipulating Defendants with process on or about November 9 and 10, 2022.

WHEREAS, the Complaint in this matter asserts claims under Section 1 of the Sherman Act based on the alleged use of RealPage, Inc.’s software for the student leasing market.

WHEREAS, Plaintiff had previously agreed with Defendants RealPage, Inc., Greystar Real Estate Partners, LLC, Cushman & Wakefield, Inc., Pinnacle Property Management Services, LLC, BH Management Services, LLC, Campus Advantage, Inc., and Cardinal Group Holdings LLC to suspend for a short period of time the deadline for those Defendants to answer, move to dismiss, or otherwise respond to the Complaint, and had agreed to file a status report with the Court by December 21, 2022, related to a schedule for the case.

WHEREAS, Plaintiff and the Stipulating Defendants have conferred telephonically and by electronic mail, and have agreed that party and judicial efficiency would be best served by suspending, for a short period of time, the deadline for the Stipulating Defendants to answer, move to dismiss, or otherwise respond to the Complaint.

WHEREAS, Plaintiff and the Stipulating Defendants have agreed to meet and confer and file a status report with the Court by December 21, 2022, related to a schedule for the case.

¹ CA Ventures Global Services, LLC, and D.P. Preiss Company, Inc., are still in the process of retaining local counsel for this action and have been represented by national counsel listed in the signature block below in conferences with Plaintiff’s counsel.

1 WHEREAS, Plaintiff anticipates that Plaintiff will propose a Rule 12 briefing schedule
2 in the status report for the litigation that Plaintiffs think will efficiently and expeditiously move
3 the case forward.

4 WHEREAS, in making this stipulation, the Stipulating Defendants do not waive, in this
5 or any other action, any (i) defenses or arguments for dismissal that may be available under
6 Fed. R. Civ. P. 12; (ii) affirmative defenses under Fed. R. Civ. P. 8; (iii) other statutory or
7 common law defenses that may be available; or (iv) right to seek or oppose any reassignment,
8 transfer, or consolidated alternatives. The Stipulating Defendants expressly reserve their rights
9 to raise any such defenses (or any other defense) in response to either the Complaint or any
10 original, amended, or consolidated complaint that may be filed in this or any other action.

11 THEREFORE, Plaintiff and the Stipulating Defendants stipulate and agree to suspend
12 the deadline for the Stipulating Defendants to answer, move to dismiss, or otherwise respond to
13 the Complaint and request that the Court enter the subjoined order pursuant to this stipulation.

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15 STIPULATED to this 30th day of November, 2022.
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STIPULATED MOTION AND ORDER SUSPENDING DEADLINE FOR CERTAIN DEFENDANTS TO
RESPOND TO COMPLAINT

No. 2:22-cv-01552-RSL

/s/ Steve W. Berman

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/s/ Breanna Van Engelen

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STIPULATED MOTION AND ORDER SUSPENDING DEADLINE FOR CERTAIN DEFENDANTS TO
RESPOND TO COMPLAINT

No. 2:22-cv-01552-RSL

ORDER


THIS MATTER came before the Court on the parties' Stipulated Motion to Suspend the Deadline for certain Defendants to Respond to the Complaint. Now therefore,

IT IS HEREBY ORDERED THAT:

The deadline for Defendants CA Ventures Global Services, LLC, D.P. Preiss Company Inc., The Michaels Organization, LLC, and Interstate Realty Management Company, to answer, move to dismiss, or otherwise respond to the Complaint is hereby suspended.

Plaintiff and CA Ventures Global Services, LLC, D.P. Preiss Company Inc., The Michaels Organization, LLC, and Interstate Realty Management Company, shall meet and confer and file a status report with the Court by December 21, 2022.

Dated this 1st day of December, 2022.



Robert S. Lasnik
United States District Judge